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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

ANGEL FRALEY; PAUL WANG; SUSAN
MAINZER; JAMES H. DUVAL, a minor,
by and through JAMES DUVAL, as
Guardian ad Litem; and W.T., a minor, by
and through RUSSELL TAIT, as Guardian
ad Litem; individually and on behalf of all
others similarly situated,

Plaintiffs,

v.

FACEBOOK, INC., a corporation; and
DOES 1-100,

Defendants.

Case No. CV 11-01726 RS

**DECLARATION OF ROBERT S.
ARNS IN SUPPORT OF
MOTION FOR FINAL
APPROVAL OF CLASS
ACTION SETTLEMENT AND
MOTION FOR ATTORNEYS'
FEES AND SERVICE AWARDS**

Date: June 28, 2013

Time: 10:00 a.m.

Courtroom: 3

Judge: Hon. Richard Seeborg

Trial Date: None Set

1 I, Robert S. Arns, declare and say:

2 1. I am a share holder and the CEO of The Arns Law Firm, PC, attorneys for Plaintiffs.

3 I am licensed in the State of California, and admitted to practice in the Federal
4 District Court for the Northern District of California. I have been practicing for 38
5 years (since 1975) and have represented families, including their children during this
6 entire period. I am one of the attorneys for Plaintiffs herein. I make this Declaration
7 in support of Plaintiffs' Motion for Final Approval of Settlement and Plaintiffs'
8 Motion for Attorneys' Fees and Service Awards, and in response to the objections
9 filed to those motions.
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11 **Class Counsel's Additional Time Spent Litigating This Case**

12 2. Subsequent to the Motion for Attorneys' Fees and Service Award, I and the attorneys
13 under my supervision at The Arns Law Firm have spent over 275 hours preparing the
14 Motion for Final Approval and addressing the objections to the fees and awards, as
15 well as answering inquires from Class members. Plaintiffs' counsel will provide an
16 accounting of such post-preliminary approval hour records to the court prior to the
17 Final Approval Hearing.
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19 **Conversation with Objector Robert Bowman**

20 3. Additionally, Prior to May 17, 2013 I have never spoken with or otherwise
21 communicated with Attorney Robert Bowman, an attorney representing himself as an
22 objector from the State of Tennessee.
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1 4. On May 17, 2013, at 1:22 pm PDT, Mr. Bowman contacted me on my cell phone and
2 confirmed who I was. I told Mr. Bowman I would like to conference in Co-counsel
3 Jonathan Jaffe. Mr. Bowman agreed I could do so.

4 5. Before Mr. Jaffe answered, Mr. Bowman stated, "I am not one of those scumbag
5 attorneys like some other objectors in this case. I've never filed an objection in the 18
6 years I have practiced law."

7 6. Then, Mr. Jaffe answered and was on the call. He introduced himself to Mr.
8 Bowman. Mr. Bowman understood that both myself and Mr. Jaffe were on the call.

9 7. I asked, "What would you like to talk about?"

10 8. Mr. Bowman replied, "I'm willing to dismiss or withdraw my objection in return for
11 monetary compensation."

12 9. I said, "Do you do what you think you have to. You can send us a letter in writing on
13 Monday."

14 10. Mr. Bowman replied, "I'll send a letter on Monday to make a demand."

15 11. Mr. Bowman went on to say, "I don't want to be too greedy about it, but I also don't
16 want to low-ball it."

17 12. I repeated my statement to Mr. Bowman that he should do what he thinks he has to.
18 Neither I nor Mr. Jaffe solicited any offer, or gave the appearance of any interest in
19 receiving an offer to drop objections in exchange for compensation.
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1 I declare under the penalty of perjury under the laws of the United States of America
2 that the foregoing is true and correct, and that if called upon to testify, I could verify the
3 accuracy of the same. Executed on June 7, 2013 at San Francisco, California.
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6 /s/ Robert S. Arns
Robert S. Arns
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28 DECLARATION OF ROBERT S. ARNS IN SUPPORT OF MOTION FOR FINAL
APPROVAL OF SETTLEMENT AND MOTION FOR ATTORNEYS' FEES AND
SERVICE AWARDS - Case No. CV 11-01726 RS